

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L. DE C.V.,  
*et al.*

Debtors in a Foreign Proceeding.

GONZALO GIL-WHITE, PERSONALLY AND IN  
HIS CAPACITY AS FOREIGN REPRESENTATIVE  
of PERFORADORA ORO NEGRO, S. DE R.L. DE  
C.V. AND INTEGRADORA DE SERVICIOS  
PETROLEROS ORO NEGRO, S.A.P.I. DE C.V.

Plaintiff,

-against-

ALP ERCIL; ALTERNA CAPITAL PARTNERS,  
LLC; AMA CAPITAL PARTNERS, LLC; ANDRES  
CONSTANTIN ANTONIUS-GONZÁLEZ; ASIA  
RESEARCH AND CAPITAL MANAGEMENT LTD.;  
CQS (UK) LLP; FINTECH ADVISORY, INC.;  
DEUTSCHE BANK MEXICO, S.A., INSTITUCIÓN  
DE BANCA MÚLTIPLE; GARCÍA GONZÁLEZ Y  
BARRADAS ABOGADOS, S.C.; GHL  
INVESTMENTS (EUROPE) LTD.; JOHN  
FREDRIKSEN; KRISTAN BODDEN; MARITIME  
FINANCE COMPANY LTD.; NOEL BLAIR  
HUNTER COCHRANE, JR; ORO NEGRO PRIMUS  
PTE., LTD.; ORO NEGRO LAURUS PTE., LTD.;  
ORO NEGRO FORTIUS PTE., LTD.; ORO NEGRO  
DECUS PTE., LTD.; ORO NEGRO IMPETUS PTE.,  
LTD.; PAUL MATISON LEAND, JR.; ROGER  
ALAN BARTLETT; ROGER ARNOLD HANCOCK;  
SEADRILL LIMITED; SHIP FINANCE  
INTERNATIONAL LTD.; and DOES 1-100

Defendants.

Chapter 15

Case No. 18-11094 (SCC) (Jointly  
Administered)

Adv. Pro. No. 19-1294(SCC)

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned hereby enter their appearance as counsel to Alterna Capital Partners, LLC, AMA Capital Partners, LLC, Maritime Finance Company Ltd., Kristan Bodden, Paul Matison Leand, Jr., Asia Research and Capital Management, Ltd., CQS (UK) LLP, Alp Ercil, GHIL Investments (Europe) Ltd., Ship Finance International Ltd. (the “Ad Hoc Defendants”) in the above-captioned Adversary Proceeding pursuant to, *inter alia*, Rules 7005, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and request that all notices given or required to be given and all papers served in this case be delivered to an served upon the following:

Andrew N. Rosenberg (arosenberg@paulweiss.com)  
Aidan Synnott (asynnott@paulweiss.com)  
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**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the Bankruptcy Code and the Bankruptcy Rules specified above, but also includes, without limitation, orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, letters, objections, replies, answers, schedules of assets and liabilities and statements of financial affairs, operating reports, plans of reorganization and liquidation, and disclosure statements, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, or otherwise.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any prior or subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive any right of the Ad Hoc Defendants to (i) have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) contest the subject matter jurisdiction of the United States Bankruptcy Court for the Southern District of New York with respect to any proceeding commenced in this case against or otherwise involving the Ad Hoc Defendants, including for the reasons stated in the Ad Hoc Defendants' Motion to Dismiss the Complaint (Dkt. 29); (v) contest the existence of personal jurisdiction over Asia Research and Capital Management, Ltd., Alp Ercil, CQS (UK) LLP, GHL Investments (Europe) Ltd., and Ship Finance International Ltd. (the "Foreign Defendants"), for the reasons stated in the Foreign Defendants' Motion to Dismiss the Complaint for Lack of Personal Jurisdiction (Dkt. 26); or (vi) any and all rights, claims, actions, defenses, setoffs, recoupments, or remedies to which the Ad Hoc Defendants are or may be entitled under agreements, in law or in equity, any and all of which are expressly reserved hereby.

Dated: September 30, 2019  
New York, New York

PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP

By: /s/ William A. Clareman  
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